

ATTACHMENT: Pratt & Whitney Aircraft  
RCRA RECORDS CENTER EPA I.D. Number ~~ME000791681~~ CTD 990672081  
FACILITY ~~Pratt & Whitney-Main St.~~ Permit Application, Notice of Deficiency  
I.D. NO. ~~CTD 990672081~~ EPA Region I, State Waste Programs Branch  
FILE LOC. R-1B  
OTHER RDMS # 2806

The following information outlines areas where the Pratt & Whitney permit application does not meet the requirements for a RCRA permit application. ~~These requirements are given in 40 CFR Part 122~~ and refer to standards for hazardous waste management facilities in 40 CFR Part 264. These comments address the deficiencies in the permit application submitted by Pratt & Whitney for the storage of hazardous wastes and reference the applicable sections of Part ~~122~~ and 264. Additional information is necessary in each of the following areas in order for ~~EPA~~ to begin a technical review of Pratt & Whitney's RCRA permit application. 270

I. Revised Part A dated 4/20/83

a. On page 3A ~~3B~~, lines 21-26

and ~~on~~ page 3B, lines 21-26 are assumed to estimate ~~922~~ 370

Tous/yr of various F & U

waste solvents which will be incinerated. Since the incinerator ~~must be operated~~

Operating conditions will be

dictated by ~~the~~ the most  
different burning wastes,  
the company should seek to  
relatively faithfully ~~estimate~~ a  
percent of each waste type  
which might be invented  
during a given year  
to aid in selecting the  
principal organic materials  
consumers(etc) of interest.

b. There seems to be inconsistencies in the process design capacity mentioned in the ~~revised~~ revised Part A, the Part B information and the closure plan. Please clarify and make consistent -

*(Revised Part A)*  
162,250 gal  
*(Storage tanks)*

*Not to Close Plan*

*(Storage tanks)*  
502  
27,300 gal

1) S01 - Storage in Containers

- ~~Part A~~ revised Part A = 182,250 gallons
- Part B -
  - Container Storage Bldg on Page 101:  
 or ~~100~~ ~~100~~ = ~~1000~~  
~~1000 barrels~~ @ ~~55 gal~~ = 55000 gal
  - Transporter Storage Pad on Page 100:  
~~or~~ 30 Transporters @ 375 gal = 11250 gal
  - Barrel/Transporter Storage Pad on Page 101:  
 100 barrels @ 55 = 5500 gal  
 or  
~~or~~ 16 Transporters @ 375 = 6000 gal
- Therefore:  
~~or~~ Total Part B Storage = 72250 max
- Closure Plan on Page 65: ~~or~~ 55000 gal  
 Maximum Inventory - Barrel Storage =

5) 502 - Storage in Tanks -

- revised Part A ~~227300 gal~~

and

- Part B on Page 104

8 Tanks = 27300 gal

~~maximum~~

- Closure Plan on Page 65:

maximum Inventory - Tank Storage = 32000 gal.

c) T03 - Liquid injection incinerator

- revised Part A = 50 gal/hr

- Part B - Page 111: maximum waste flow rate = 47 gal/hr  
Page

## II. Facility Description

a) Topographic map [270.14 -  
formerly 122.25 (a)(19)(i-xii)]

The submitted topographic map does not completely satisfy the information requirements. The following must be submitted:

- North area of map ~~as~~ along Rixley Street ~~as~~ only shows ~400 ft around facility, up to ~~must~~ must be included, also include surrounding land uses.
- Include a wind rose.
- Include location of any ~~offsite~~ injection or withdrawal wells

both on-site and off-site

- Indicate other structures; ~~run-off control systems, storm, sanitary and process sewer systems, loading and unloading areas, fire control facilities.~~
- Indicate the <sup>waste hauler</sup> traffic pattern and control; ~~off-site~~ show turns and across traffic lanes, stacking lanes if appropriate, show traffic control signals

### III. Waste Characteristics

a) Chemical and physical characteristics  
 (270.14 <sup>formed</sup> ~~in~~ 122.25 (a)(2) and 264.13)

The company states the primary basis for characterization of waste will be the process information of known process solutions which are ~~determined~~ found to no longer meet operating specifications as determined by

Since a process solution  
the natural culture would  
necessarily be discarded  
and the other two  
processes besides  
would be used.  
Or communication with other  
countries will still develop  
but by which way  
is not clear.  
In addition to  
the natural culture  
which is a process solution  
there would be  
a number of  
other methods  
which are called  
"Process Solutions".  
Indeed the  
deputy of  
also  
process  
infiltration.  
could be  
of whom acquisition  
of which could be  
characteristics  
of which could be  
also  
process  
solutions  
which are called  
"Process Solutions".  
Also

To ensure that measured waste  
from discussions on procedures used  
include discussions on procedures used  
to control waste of processes  
conducive to the use of barrels for the use of barrels  
discuss how the company ensures  
compliance by the use of the  
guidelines (270.15(a) - formerly 122.25(b)(1)(ii)(A) and  
(i) For barrels and tanks/parts, please  
see 171 + 172)  
(ii) Cultivars (270.15(a) - formerly 122.25(b)(1)(ii)(A) and  
process in affection II

not needed for subtitle.  
These surfaces specify are  
area. At this time, topics to  
located over the next few  
in volumes of literature

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containers are always kept closed except when adding or removing waste, and that they are stored transported, opened, and handled in a manner that they do not rupture or leak.

Also please provide the figures drawn to scale of the plan for aisle space and for the maximum planned inventory for the 3 storage areas.

Also include sample computer reports which will be used to

ensure the 1000 drum maximum and the 350 maximum tree liquid drums is not exceeded.

- 3) Container for all dimensions ~~for~~ <sup>other</sup> smaller and calculations which support containment volumes shown in application in addition
- a) Container Storage Building:

This building has 5 separate containment areas, however the part B is not clear on how the 350 barrels maximum will be distributed among the 5 areas to ensure minimum volume containment in each compartment.

~~b)~~ <sup>b)</sup> Transporter Storage Pad

Similarly, this pad has 3 separate compartments, detail the individual volumes and arrangement of <sup>the 3D</sup> transporters in each compartment to verify 10% volume containment.

c) Barrell / Transporter Storage Pad  
Describes how barrels and/or transporters are arranged on this pad, also how are barrels kept away from contact with any accumulated liquids.

④ Removal of Contained Liquids -  
Please specify the

4(d) Incompatible Waste:

Re 101 stated incompatible waste are stored in non-adjacent compartment, please clarify and state which compartments are used for which type of wastes to ensure no ~~too~~ incompatible waste mixing if leaks occur.

1. The company must develop a suitable and procedural ~~and~~  
assessing the influence of all funds.  
2. On July 23, 1941 company plans to  
supply labor and equipment as required by law.  
4 funds are extra recruited however please  
consider this. Note part 6 states only  
thimless, subsurface and foundation  
steel thickness versus design  
layer if appropriate, actual  
standard, construction materials,  
for each the specific design  
on P. (24), please designate  
Tunis - (250.16 formerly 122.25(2)(2) and  
264.191) ~~designed~~ ~~for the~~ ~~each~~ funds listed  
(4) ~~designed~~ ~~for the~~ ~~each~~ funds listed  
(5) ~~designed~~ ~~for the~~ ~~each~~ funds listed  
(6) ~~designed~~ ~~for the~~ ~~each~~ funds listed

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to be emptied. Please expand  
on this practice, specifically  
to prevent incompatible  
materials from mixing or  
harming tank materials (See 264.176))

3 a) Tank Management -

a) Please discuss the Company's controls  
and practices to prevent overfilling  
related to waste feed shut-offs, bypass  
systems to a standby tank, high level  
alarms or maintenance of a  
minimum freeboard.

b) p. 104 notes secondary  
containment is provided for all  
storage tanks. Although this

is not required under present Federal regulations, please provide the containment volume available for each tank, and how much waste mixing is prevented.

### Insert C) Inventor



(On Contingency Plan C 270.14 formerly 122.25(a)(7)

describe the company procedures for ensuring that all emergency equipment listed in the plan is cleaned and fit - for its intended use before operations and remained following any incident requiring implementation of the contingency plan

C. Incineration (270.19 formerly  
122.25(b)(5)(i) and  
264.340

1) Waste Analysis -

The Company proposes to  
burn two distinct hazardous  
waste feeds, cyanide solutions &  
waste solvent / spent / still bottoms.

The company must provide a more  
complete characterization of  
each feed. The CN-  
solutions should be analysed  
~~to~~ to verify the lack of  
significant <sup>to CER part 261</sup> Appendix ~~H~~  
Organic constituents.

the ~~analytical~~  
by the analytical methods  
within the precision produced  
~~ideulfide~~ in the waste  
of the hazardous constituents  
an approximate quantity  
The waste to be burned, and  
~~significant amounts (>100 ppm)~~ in  
~~III (potassium)~~ are present in  
all CFR Part 261, Appendix  
organic constituents listed in  
ideulfication of any hazardous  
deplete to include an  
Stream ~~must~~ be ~~better~~  
the waste organic feed  
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Specified in "Test Methods  
for the Evaluation of Solid  
Waste, Physical-Chemical  
Methods" (or their  
equivalent (see 122.20  
for reference). Also  
the application on wastes a  
future solvent recovery  
process addition chemicals  
is likely to alter the  
future character of  
and feed to the  
incinerator, please discuss  
the company's plan to  
commercialize that new

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waste stream to aid in selecting future POC's.

- 2) Description of Indicators
- The company was provided specifications on the prime air mover, ~~but please describe~~ the ~~diff~~ equipment used to continuously monitor and record the combustion gas velocity.
- Similarly the ~~apparatus~~ stakes the waste feed rate is monitored, but

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Please describe how the  
waste feed rate is  
regulated.

- The company states on page 119,  
~~that~~ an 8000°F feed shoot off temp, however sets  
3) Test Schedule - a minimum  
operating temp of 1832°F  
The company  
has not been  
made  
consistent  
specified when the trial  
burn will be conducted,  
Auxiliary fuel -  
4) The company has not  
specified an auxiliary  
fuel feed rate for each  
test burn.

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### 5) Operating Conditions for Pollution Control Devices

Please designate the ~~design~~ operational requirement for inlet gases to the packed tower scrubber other than "only" to protect the packing."

The application is not consistent on the planned operational pH of the scrubber solution, p. 109 state 8.0 - 8.5 and pp. 111 & 117 state 7.5 - 8.5, please make a consistent.

we can always do complete justice to the company and help it to succeed, please justify us fully. Yours, A. H. B.

Closest Plan - (20.14 ft over 12.25(4)(13)) in Company with extensive material in close proximity to Class 1 by closure

and his/her qualities.

Personnel Training (270-14 formerly 122-256) (2)   
The company did not identify  
a Training Director (264-16(9)(2)),

The plan does not deserve the  
special study which will  
be given if education is necessary.

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make the closure milestones consistent on page 65  
(January thru September) and  
p. 66 - (one year for closure).

Upon closure, describe management  
of empty containers and transporters  
within section I(V) at p. 70.

Please update closure cost  
estimate to May, 1983, on  
p. 73.

~~Get copy of financial review - for comments on mechanism.~~

WHT - Liability Insurance - formerly 122.25(g)(1) + 264.147(a)(2)(i)

The company provided an insurance policy for the proper liability however the attached Hazardous Waste Facility liability endorsement does not follow

The language required by

264.151(i) please resubmit.

appropriately worded ~~other~~ ~~other~~ endorsement.

The endorsement must be worded exactly as specified in § 264.151.